

From: [Faryan, Steve](#)
To: ["Lisa Graczyk"](#)
Subject: FW: Stantec FTP Confirmation - WEDRON QAPP
Date: Tuesday, December 10, 2013 12:36:00 PM
Attachments: [image015.png](#)
[image016.jpg](#)
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[QAPP RESPONSE TO COMMENTS.docx](#)

Lisa,

Could you check to see if they implemented your comments.

Thanks

From: Gorski, Alan [mailto:Alan.Gorski@stantec.com]
Sent: Tuesday, December 10, 2013 12:03 PM
To: Faryan, Steve
Cc: Price, Luisa; Wojciechowski, Mary C; Clark, Jacqueline; Kenney, Thomas; Reinhart, Douglas S (Douglas.Reinhart@bp.com)
Subject: FW: Stantec FTP Confirmation - WEDRON QAPP
Steve: The link below will direct you to the FTP site that contains the Final Wedron QAPP. Also attached are the Stantec/BP responses to EPA comments that were provided to Mary Wojciechowski via email on November 22, 2013.
The QAPP Signature page is currently being distributed and will be provided to EPA for inclusion into the final report when all signatures are received.
Thanks-
Alan Gorski
Senior Scientist

Stantec
2335 Highway 36 West St. Paul MN 55113

Phone: (651) 255-3956
Cell: (651) 343-9924

Alan.Gorski@stantec.com



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Please consider the environment before printing this email.

From: CORPFTP@temp.stantec.com [mailto:CORPFTP@temp.stantec.com]
Sent: Monday, December 09, 2013 4:04 PM
To: Emery, David (Lombard)
Subject: Stantec FTP Confirmation - WEDRON QAPP
Your request has been successfully created.

Please use the automatic login link below to access your site. You have also been provided a manual link, username and password in case your computer disables the automatic login link.

NOTE: FTP Sites are not included in Stantec daily backups and are only intended to be used as a means of transferring large files between offices, clients, etc.

Automatic Login

FTP site link: <ftp://s1223150329:7713025@ftptmp.stantec.com>

By clicking on the link above (or pasting the link into Windows Explorer) you will be automatically logged into your FTP site.

Manual Login

FTP link: <ftp://ftptmp.stantec.com>

Login name: s1223150329

Password: 7713025

Disk Quota: 2GB

Expiry Date: 12/23/2013

If your site has not expired and you require a onetime 2 week extension, please contact the [IT Service Center](#).

If you require more than 2 weeks, please request an FTP Project Directory. Information on the FTP Project Directory request procedure is posted in the [StanNet Help Center](#).

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QAPP RESPONSE TO COMMENTS

QAO designation- On the signature page, Section 2.1.11 and in other portions of the document (primarily subsections in Section 4), they have an EPA QA Officer listed as the QAPP reviewer and as a decision-maker for certain issues related to data quality. The signature page lists Ida Levin as this person. If she will not be reviewing the document or acting in this capacity, Steve may want to be identified as the person making QA decisions as necessary.

Stantec/BP Response: References to the EPA QAO have been removed; quality assurance decisions have been added to the list of EPA OSC responsibilities. With the removal of Section 2.1.11 and the EPA QAO, all references to the QAO in the QAPP now refer to the Stantec QAO.

Figure 1 – Revise or remove the EPA QAO as necessary.

Stantec/BP Response: Figure 1 has been revised

Section 2.1.10- There is some ambiguity in the document for the amount and type of data verification/validation. This section states that 10% of the data will be selected by the BP/Stantec Project Manager for full validation by a Stantec employee. Ten to 25 percent for validation is acceptable, but there is no mention in this section of how much data will go through the verification process prior to validation. I believe that we usually ask for a third-party review, so it would not be done by a person working for the project consulting firm. Also, the validator usually chooses the data to be reviewed and not the project manager from my experience.

Stantec/BP Response: Section 2.1.10 has been modified to include clarification on project goals of 100% data verification and 10% data validation. Independent data validators are routinely employed by the consulting firm performing the investigation and sampling activities. In addition, the requirement to provide validated data to EPA within 30 days of Respondent's receipt of the data (AOC Section XIV, paragraph 83) necessitates Stantec's input into timing and scheduling of the data validation process.

Section 2.3- This section states that sampling locations will be located using GPS with accuracy of 3 meters or less. Steve may want to have a more accurate GPS used or have the locations surveyed to agree with what the other companies are doing/have done.

Stantec/BP Response: Determination on accuracy of GPS locations will be at the discretion of EPA.

Section 2.4 Quality Objectives- There are no project-specific DQOs in the document. This section describes the process in a generic fashion, but does not describe how the data will be produced to meet the project needs or with what the data will be compared to determine whether additional work needs to be performed at the site. The section needs revision to include this information. I suggest that Steve reference the Wedron Silica/GZA QAPP for Stantec to use as an example for the type of DQO information that we need to see.

Stantec/BP Response: Section 2.4 has been modified to include clarification of project-specific DQOs.

Section 2.4.6 – This should have a subsection for Field Equipment Sensitivity. EPA had asked that a PID sensitive enough to get down to the ppb range be used because of the low TACO standard for benzene. The sensitivity of the PID should be stated in this section.

Stantec/BP Response: Section 2.4.7.3 – Field Equipment Sensitivity has been added to the QAPP to provide details on the sensitivity of the PID to be used for soil field screening.

Section 2.6.1.2 In the 3rd paragraph, the document states that "All data will be validated manually..." The last paragraph states that all soil and groundwater data will be validated. There is no statement about how much data will be verified, which is the step before validation. The statements in this section would seem to mean that 100% of the data would be both verified and validated. Section 2.1.10 (comment above) states that there will be 10% validation. This section needs to be reworded if they do not plan to do 100% data validation.

Stantec/BP Response: Section 2.6.1.2 has been modified to include clarification on project goals of 100% data verification and 10% data validation.

Section 2.5.2 Laboratory certifications- Appendix A includes the laboratory certifications, but only a list of them supplied by Pace Lab in a table. GZA (for the Wedron Silica QAPP) provided copies of the original certifications from the State agencies for the specific analyses that we are using for this project. There is no need for them to supply every certificate they have from every State, but we should see the ones from IL to see if they are certified for the appropriate analytical methods

Stantec/BP Response: Pace Laboratory certificates for specific analyses have been attached to Appendix A.

Section 3.1.4 – For documentation, there should be a description of how soil borings will be logged.

Stantec/BP Response: A description of soil boring logging is provided in Appendix C – Standard Operating Procedures and Field Forms, ERPA-001 – Soil Sampling, November 2011.

Section 3.3.3 – There is an inconsistency in the QAPP as to the frequency of MS/MSD collection. Section 2.4.1.2 states that MS/MSDs will be collected for every 10 samples and Section 3.3.3 says per every 20 samples. This should be kept consistent throughout document.

Stantec/BP Response: The Field Precision Objectives section (renumbered to Section 2.4.2.2) has been modified to reflect an MS/MSD collection frequency of one MS/MSD per 20 samples collected.

Section 5.1- States that Stantec will perform verification on 100% of the data. No mention of validation percentage. (See comments above regarding levels of validation/verification).

Stantec/BP Response: Section 5.1 has been modified to include clarification on project goals of 100% data verification and 10% data validation.